

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(MIAMI DIVISION)**

JANE DOE,

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

CASE NO: 1:25-cv-20757-JB/Torres

DECLARATION OF JOAN S. PETERS PURSUANT TO 28 U.S.C. § 1746

I, Joan S. Peters, declare as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above captioned action. I have personal knowledge of the matters contained herein and if called upon to testify could offer competent testimony thereto.

2. I am submitting this declaration in support of Plaintiff's Motion to Submit Audio Files Conventionally [ECF 150].

3. On or about September 24, 2025, I personally viewed two publicly available YouTube videos posted on the channel Foodshop located at the following URLs: https://youtu.be/JXFl4fBob_4?t=6937; <https://www.youtube.com/watch?v=UEnB49z9l0s&t=15704s>. The first video was from a September 8, 2025 livestream, and the second video was from a September 9, 2025 livestream.

4. The two videos depicted statements made by Defendant, Steven K. Bonnell II. I am familiar with the voice and appearance of the Defendant from his publicly posted broadcasts. In the video clips, the Defendant was also identified by his name, and his image and voice were recognizable. I referenced and cited each of these same two YouTube links in Plaintiff's

DOE v BONNELL
CASE NO: 1:25-cv-20757-JB/Torres

Opposition to Defendant's Motion to Dismiss filed on October 3, 2025 ("Opposition")(ECF No. 139).

5. Sometime after October 3, 2025, I discovered that the YouTube videos had been privatized (after the filing of the Opposition) and were no longer accessible at the original links.

6. Subsequently, I located reposted copies of excerpts of the same videos on the Kiwi Farms social media platform at <https://kiwifarms.st/threads/steven-bonnell-ii-destiny-destiny-gg.29205/page-2006#post-22565528>, at page 2006. The Kiwi Farms post (by Latrell Sprewell) included links to the two excerpts: https://youtu.be/JXF14fBob_4?t=6937 and <https://youtu.be/UEnB49z9l0s?t=15704> that I had cited in the Opposition to Motion to Dismiss. I personally compared these reposted excerpts to the original videos I had viewed on YouTube, and the two excerpts cited in the Opposition, and confirmed that they were identical in content, duration, and dialogue. Prior to October 3, 2025, I had downloaded the transcript which You Tube provides for the two original excerpts and they were the same as the reposted excerpts.

7. On or about October 15, 2025, I provided the link to the Kiwi Farms post (by Latrell Sprewell) to our firm's IT engineer, Mr. Benjamin Waas, for the purpose of creating an audio-only version suitable for filing with the Court. Mr. Waas downloaded the clips directly from the Kiwi Farms link, and then used an online converter to convert the mp4 to mp3 files, and sent the two audio files to me. I personally reviewed the audio files and confirmed that they accurately reproduce the same content I observed in the original YouTube videos and the reposted copies. I then uploaded the audio files onto a USB drive.

8. The audio files have not been edited, altered, or enhanced in any way and are true and accurate representations of the statements made in the videos as originally viewed.

DOE v BONNELL

CASE NO: 1:25-cv-20757-JB/Torres

9. The audio files have been preserved in their original form since that date.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge and understanding, the foregoing is true and correct.

Executed in Naples, Florida, this 4th day of November, 2025.

s/ Joan Schlump Peters
Joan Schlump Peters